

CA 02-164 E

Cover Page

Fleming
v.
Super. Wolfe, ET AL,
PLAINTIFF
DEFENDANT

C.A. NO. 02-164 ERIE
JUDGE McLAUGHLIN
MAGISTRATE BAXTER
NOTICE OF NEEDED DISCOVERY LETTER

DEAR MR. MERICLI

THIS LETTER IS TO INFORM YOU OF JUDGE BAXTER'S ORDER, DATED 8-31-05, AND OUR DISCOVERY ISSUES RESPECTFULLY, I AM PURSUING THIS CASE TO TRIAL (PRO SE) "RESPECTFULLY" AND GRANTED IN PART, FOR DISCOVERY OF PRODUCTION OF ANY VIDEO TAPES IN THE DEFENDANTS' POSSESSION THAT SHOW ANY OF THE INCIDENTS WHICH I CLAIM I WAS SUBJECT TO AN EXCESSIVE USE OF FORCE, WHICH YOU HAVE (20) DAYS, I WOULD NOW LIKE TO RESPECTFULLY INFORM YOU THAT, I SENT YOU AND THIS COURT A MOTION TO COMPEL DATED DEC. 31, 04, FOR INTERROGATORIES AND PRODUCTION, WHICH HAD (5) EXHIBITS ATTACHED FOR DEFENDANTS, SGT. KREIDER, LT. LEGGORE, CO. 1 WITHEL, CO. 1 ALLEN, ALL OF CAMPHILL, ALSO CAPT. T. WEAVER, AN ORIGINAL DEFENDANT OF ALBION, WHICH WAS NEVER RESPONDED TO BY YOU OR THIS HONORABLE COURT, WHICH IS CLEARLY IN VIOLATION OF THE RULES OF FED. CIV. PROCEDURE, FOR CIVILIANS SUCH AS MYSELF PURSUING A CIVIL MATTER TO TRIAL (PRO SE), I RESPECTFULLY PRAY YOU ADHERE TO THESE REQUESTS AS SOON AS POSSIBLE.

I WOULD ALSO PRAY YOU PRODUCE THE VIDEOS OF DEFENDANTS C.O. 1 DAVIDSON, AND C.O. 1 MALDANDO OF THE AUG. 2, 2002 INCIDENT, MISCONDUCT #A296503, ACCUSING ME OF BREAKING A KEY CUFF, (PLEASE PRODUCE A COPY OF THE DC-ADM 001 POLICY THE INMATE ABUSE MONITORING).

AND THE VIDEO OF THE AUG. 23, 2002, INCIDENT OF DEFENDANT C.O. 2 DAVIDSON, AND C.O. 1 MALDANDO, MISCONDUCT #A296519, ESCORTING ME TO MORNING YARD AND SLAMMING THE YARD GATE ON ME, WITH DEFENDANT CAPT. ROBINSON, REVIEWED.

PLEASE UNDERSTAND THAT IF ALL OF THE ABOVE IS FULLY UNDERSTOOD AND PROVIDED, ALL DISCOVERY ISSUES WILL BE SETTLED, AS I STATED AT OUR LAST TELE-CONFERENCE, I WOULD ALSO LIKE TO INFORM YOU THAT AT OUR SEPT. 19, 05, PRE-TRIAL CONFERENCE, I WILL BE DISCUSSING SUBPOENAS, TO ASSIST ME WITH MY (PRO SE) TRIAL. I THANKS FOR YOUR TIME AND GOD BLESS YOU, HERE AND PRAY TO HEAR FROM YOU SOON.

I CERTIFY ON THIS 12TH DAY OF SEPT. 05 THAT I HAVE SERVED A COPY OF THIS NOTICE ON ALL PARTIES INDICATED BELOW.

- (2) COURT CLERK IN ERIE PA
- (1) KEMAL M. ATT. FOR THE DEFENDANTS

Respectfully

Ronald Fleming (Pro se)
350 Bessemer St. Steelton PA
17113